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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EDUARDO RAMOS,

Plaintiff,

v.

**BANK OF AMERICA, N.A.,
WELLS FARGO FINANCIAL
NEVADA, INC., and EXPERIAN
INFORMATION SOLUTIONS,
INC.,**

Defendants.

Case No.: 2:15-cv-00278-RFB-GWF

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DISCOVERY
DEADLINES PURSUANT TO FED.
R. CIV. PR. 16(B)(4) AND LOCAL
RULE 26-4**

[FIRST REQUEST]

1
2 Plaintiff EDUARDO RAMOS (“Plaintiff”), and Defendant BANK OF
3 AMERICA, N.A. (“Bank of America”), hereby submit the following Stipulation to
4 Extend Discovery Deadlines Pursuant to Fed. R. Civ. Pr. 16(b)(4) and Local Rule
5 26-4. The current deadline is set for September 30, 2015. Plaintiff has reached
6 settlement with Defendant Experian Information Solutions, Inc. (see Dkt. No. 21)
7 and Wells Fargo Financial Nevada, Inc. (see Dkt. No. 19).
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10 Pursuant to Local Rule 26-4 (a-d), the parties state as follows:

11 **A. Discovery Completed to Date:**

12 Plaintiff conducted written discovery with Experian. Plaintiff propounded
13 written discovery requests upon Bank of America. Plaintiff also scheduled and
14 noticed the deposition of Bank of America’s Person Most Knowledgeable.
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17 **B. Discovery that Remains to be Completed:**

18 Bank of America will respond to Plaintiff’s written discovery requests.
19 Plaintiff will depose Bank of America’s Person Most Knowledgeable.
20

21 **C. Reasons for the Request to Extend Discovery Deadlines:**

22 A 60-day extension of the current discovery deadline is necessary in order
23 for the parties to adequately try this matter. Plaintiff properly provided notice of
24 the September 17, 2015 deposition of Defendant’s Person Most Knowledgeable.
25 Defendant informed Plaintiff that the deposition will have to take place in either
26 Texas or North Carolina, and that Defendant needed up to two weeks to determine
27
28

1 the location. The LR 26-4 deadline to request an extension of the discovery cutoff¹
2 will pass before Bank of America determines the location for the deposition. Once
3 that determination is made, the parties will need to coordinate a mutually
4 agreeable date for the deposition.
5

6 Additionally, this extension will allow the parties a chance to resolve this
7 matter without further litigation. Plaintiff and Bank of America have been
8 engaged in good faith settlement negotiations over the course of the previous
9 number of months.
10

11 Thus, Plaintiff and Bank of America believe that it is in the interest of
12 judicial economy to allow all pending discovery to be conducted so that the
13 parties may adequately and fully try this matter before the Court should resolution
14 not occur. Extending discovery will allow the parties to coordinate discovery
15 responses and depositions so that the parties may fully present their positions to
16 this Court without any prejudice to either party.
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28 ¹ Since the discovery cutoff is September 30, 2015, the deadline to request an extension of the
cutoff is September 9, 2015.

D. Proposed Schedule for Completing all Remaining Discovery:

The current discovery deadline is set for September 30, 2015. The parties propose the following schedule for all remaining discovery deadlines:

1. The close of discovery should be extended to November 30, 2015²;
2. The dispositive motion deadline should be extended to December 30, 2015;
3. The Joint Pre-Trial Order deadline should be extended to January 29, 2016.

DATED: September 3, 2015

AKERMAN LLP

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/s/ Matthew Knepper

/s/ DANNY J. HOREN

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: September 4, 2015

² 60 days from September 30 is November 29, which falls on a Sunday. November 30, 2015 is the next judicial day.